

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

IN RE:	§	CHAPTER 11
	§	
HIGH MAINTENANCE	§	
BROADCASTING, LLC, and	§	Case No. 13-20270
	§	
GH BROADCASTING, INC.,	§	
	§	
Debtors	§	Jointly Administered

**DEBTORS' EMERGENCY MOTION TO VACATE OR MODIFY DEADLINES
CONTAINED IN COURT'S POST-CONFIRMATION ORDER**

Debtors High Maintenance Broadcasting, LLC and GH Broadcasting, Inc. (collectively, the “Debtors”) file this emergency motion to request the entry of an order modifying the deadlines contained in the Court’s October 17, 2014 Post-Confirmation Order and Notice (the “Post-Confirmation Order”) [Docket No. 314], and in support state as follows:

1. On October 17, 2014, the Court entered its Findings of Fact, Conclusions of Law, and Order (the “Confirmation Order”) [Docket No. 312] confirming the Debtors’ Second Amended Joint Plan of Reorganization (the “Plan”). The Confirmation Order incorporates and approves the Plan and its contents. Confirmation Order at ¶ 1. The Plan establishes various post-confirmation deadlines, including deadlines for filing administrative expense claims and objecting to claims. Plan at §§ 1.79, 3.01(a), (b), 11.01. Generally, those deadlines are 90 days from the effective date of the Plan.

2. Shortly after entering the Confirmation Order, the Court entered the Post-Confirmation Order, which requires that applications for the award of administrative expenses, claim objections, and adversary proceedings be filed within 30 days. As a result, the deadlines set forth in the Post-Confirmation Order conflict with the deadlines contained in the Plan and

approved in the Confirmation Order. Accordingly, the entry of the Post-Confirmation Order has created uncertainty regarding the various post-confirmation deadlines.

3. In order to eliminate any uncertainty over post-confirmation deadlines, the Debtors request the entry of an order either vacating or modifying the deadlines contained in the Post-Confirmation Order. Specifically, the Debtors request that the Court vacate the deadlines contained in paragraphs 1, 2, and 4 of the Post-Confirmation Order. The Debtors will file a post-confirmation report as required by paragraph 3 of the Post-Confirmation Order.

4. The Debtors request that this motion be considered on an emergency basis so that it may be heard and resolved sufficiently in advance of the 30 day deadlines impose by the Post-Confirmation Order.

Dated: October 17, 2014

Respectfully submitted,

NELIGAN FOLEY LLP

By: /s/ Patrick J. Neligan, Jr.
Patrick J. Neligan, Jr.
Texas Bar No. 14866000
pneligan@neliganlaw.com
John D. Gaither
Texas Bar No. 24055516
jgaither@neliganlaw.com
325 N. St. Paul, Suite 3600
Dallas, Texas 75201
(214) 840-5300
(214) 840-5301 (fax)

COUNSEL FOR THE DEBTORS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 17, 2014, a true and correct copy of the foregoing was served via first class U.S. mail, postage prepaid, upon the Notice Parties and electronically via this Court's ECF notification system.

/s/ Patrick J. Neligan, Jr.
Patrick J. Neligan, Jr.